1	SADOW LAW FIRM
	David J. Rothenberg (NV 13576)
$_2$	5588 S. Fort Apache Rd., Suite 130
-	Las Vegas, NV 89148
3	Tel: (702) 249-0160
	Email: david@sadow.law
4	Attorney for Mexican Gold &
	Oil Exploration Trust
5	UNITED S

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

CANDY TORRES,

Plaintiff

vs.

ALLAN ROTHSTEIN,

No. 2:19-CV-00594-APG-EJY

STIPULATION AND ORDER FOR CONTINUANCE OF DEADLINE FOR OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND

Defendants.

## Stipulation and Order for Continuance

Plaintiff Candy Torres, Defendants Allan Rothstein, and Drake Rothstein as Trustee of The Mexican Gold & Oil Exploration Trust dated November 7, 2012 (the "Trust") by and through their respective counsel, hereby stipulate and agree as follows:

- 1. The deadline to oppose Plaintiff's Motion for Leave to Amend, currently set for February 16, 2024, shall be continued for fourteen (14) days, until March 1, 2024.
- 2. Good cause exists for the continuance. The parties require additional time to engage in settlement discussions with the proposed new defendants.
- 3. The parties agree that the ends of justice are served by granting this continuance to allow for a more efficient resolution without judicial resources.

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	1	4. This is the first stipulation for continuance filed in this matter for this hearing		
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	3	DATED this 16th day of February 2024.	DATED this 16th day of February 2024	
	4	( / 5 . / 5 . /	/ // 2 / / 15	
	5	/s/ David Rothenberg David J. Rothenberg (NV 13576)	/s/ Liza Cristol-Deman_ Christopher Brancart (NV 8969)	
	6	SADOW LAW FIRM 5588 S. Fort Apache Rd., Suite 130	Liza Cristol-Deman, Pro Hac Vice	
	7	Las Vegas, NV 89148	(CA 190516) BRANCART & BRANCART	
	8	Tel: (702) 249-0160 Email: david@sadow.law	Post Office Box 686 Pescadero, CA 94060	
	9	Attorneys for Mexican Gold & Oil Exploration Trust	cbrancart@brancart.com lcristoldeman@brancart.com	
	10		Attorneys for Plaintiff	
	11			
130	12	DATED this 16th day of February 2024.	Kristopher Pre (NV 14106) NEVADA LEGAL SERVICES 530 South 6th Street	
<b>Sadow LAW FIRM</b> 3. Fort Apache Rd. Suite 130 Las Vegas, NV 89148 (702) 249-0160	13		530 South 6th Street Las Vegas, NV 89101	
	14	/s/ Adam M. Solinger Michael L. Becker	kpre@nevadalegalservices.org Attorneys for Plaintiff	
adow LAW FIR ort Apache Rd. Vegas, NV 89: (702) 249-0160	15	Adam M. Solinger		
	16	LAS VEGAS DEFENSE GROUP, LLC 2970 W. Sahara Avenue		
5588	17	Las Vegas, NV 89102 clients@702defense.com		
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## **ORDER**

The Parties at issue having stipulated to and for good cause shown:

IT IS HEREBY ORDERED that the deadline for opposition to Plaintiff's Motion for Leave to Amend is continued from February 16, 2024 to March 1, 2024.

IT IS SO ORDERED.

DATED: February 20, 2024

United States District Judge